

REMARKS

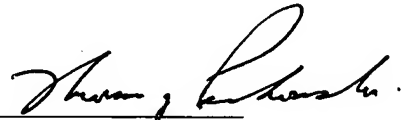
Applicant thanks the Patent Office for the careful attention accorded this Application and respectfully requests reconsideration in view of the Amendment above and remarks set forth below.

In response to the Office Action, Applicant has amended Claims 57-70, 72, 73 and 75-78 to claim, in combination, a computerized system for implementing a method of reducing risk in a payment-based transaction, which is believed to be statutory subject matter under 35 USC Section 101.

Applicant firmly believes that the present Application with amended Claims 57-80, is now in condition for allowance.

Favorable action is earnestly solicited.

Respectfully submitted,



Dated: January 29, 2009

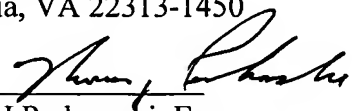
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Date: January 29, 2009